

INTERCOMPANY MEMORANDUM

SUBJECT: POLICY AGAINST HARASSMENT AND DISCRIMINATION

JOSEPH AUTO GROUP AND ITS DEALERSHIPS ARE COMMITTED TO PROVIDING A BIAS-FREE ENVIRONMENT WHERE EVERY EMPLOYEE IS TREATED WITH RESPECT AND IS ABLE TO PERFORM HIS OR HER DUTIES FREE OF BIAS OR HARASSMENT. THE COMPANY AND THE LAW PROHIBIT WORKPLACE HARASSMENT DUE TO RACE, GENDER, RELIGION, AGE, DISABILITY AND/OR NATIONAL ORIGIN.

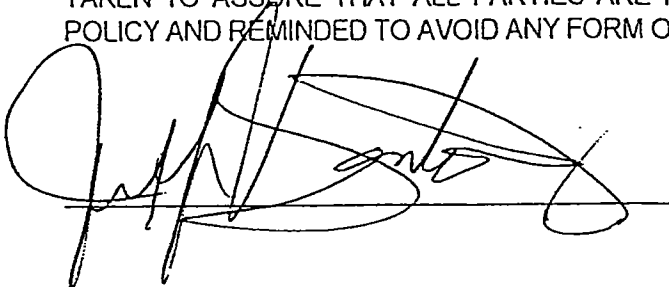
THE COMPANY STRONGLY DISAPPROVES OF AND DOES NOT TOLERATE ANY FORM OF SEXUAL HARASSMENT. ALL EMPLOYEES MUST AVOID OFFENSIVE OR INAPPROPRIATE SEXUAL BEHAVIOR AT WORK, AND EACH IS RESPONSIBLE FOR ASSURING THAT THE WORKPLACE IS FREE FROM SEXUAL HARASSMENT AT ALL TIMES.

THE COMPANY PROHIBITS UNWELCOME SEXUAL ADVANCES; REQUESTS FOR SEXUAL ACTS OR FAVORS, WITH OR WITHOUT ACCOMPANYING PROMISES, THREATS, OR RECIPROCAL FAVORS OR ACTIONS; AND ALL OTHER VERBAL OR PHYSICAL CONDUCT OF A SEXUAL NATURE AFFECTING AN EMPLOYEE'S PERFORMANCE OR CREATING A HOSTILE OR OFFENSIVE WORKING ENVIRONMENT.

COMPLAINTS OF SEXUAL HARASSMENT ARE PROMPTLY AND CAREFULLY INVESTIGATED BY THE COMPANY. ALL EMPLOYEES ARE ASSURED OF BEING FREE FROM ANY AND ALL REPRISALS OR RETALIATION FOR FILING SUCH COMPLAINTS. AN EMPLOYEE HAVING A COMPLAINT OF SEXUAL HARASSMENT BY ANYONE, INCLUDING SUPERVISORS, CO-WORKERS, VISITORS, OR CUSTOMERS, SHOULD IMMEDIATELY REPORT THE PROBLEM TO COMPANY OFFICIALS. AN EMPLOYEE SHOULD BRING THE COMPLAINT TO THE ATTENTION OF THE EMPLOYEE'S IMMEDIATE SUPERIOR, OR THE EMPLOYEE MAY CONTACT LINDA MAY, KARL STEWART, OR GREG JOSEPH, OR IF THE COMPLAINT INVOLVES A SUPERIOR IN THE EMPLOYEE'S LINE OF COMMAND, THEN TO ANOTHER REPRESENTATIVE OF THE COMPANY. IT IS YOUR RESPONSIBILITY TO REPORT SUCH CONDUCT IMMEDIATELY.

INVESTIGATION OF A SEXUAL HARASSMENT COMPLAINT GENERALLY WILL INCLUDE INTERVIEWS WITH THE RELEVANT PERSONS, INCLUDING THE COMPLAINANT, THE ACCUSED, AND OTHER POTENTIAL WITNESSES. THE IDENTITY OF THE COMPLAINANT (S) AND THE PERSON (S) ACCUSED OF SEXUAL HARASSMENT WILL BE AS CONFIDENTIAL AS POSSIBLE. IN ADDITION, PRIVACY WILL BE RESPECTED.

THE COMPANY WILL REVIEW ITS INVESTIGATION FINDINGS WITH THE COMPLAINANT AT THE CONCLUSION OF ITS INVESTIGATION. IF THE INVESTIGATION REVEALS THAT THE COMPLAINT IS VALID, IMMEDIATE AND APPROPRIATE CORRECTIVE ACTION, UP TO AND INCLUDING DISCHARGE, WILL BE TAKEN TO STOP THE HARASSMENT AND PREVENT ITS RECURRENCE. IF THE VALIDITY OF THE COMPLAINT CANNOT BE DETERMINED, IMMEDIATE AND APPROPRIATE ACTION WILL BE TAKEN TO ASSURE THAT ALL PARTIES ARE REACQUAINTED WITH THIS SEXUAL HARASSMENT POLICY AND REMINDED TO AVOID ANY FORM OF SEXUAL HARASSMENT IN THE FUTURE.

A large, stylized handwritten signature in black ink, likely belonging to a company representative, is written over the bottom portion of the text.